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January 26, 2016

By ECF and Email

Hon. Andrew L. Carter, Jr.
United States District Court
Southern District of New York
40 Foley Square, Room 435
New York, New York 10007

Re: *United States v. Edward Durante, et al.* S4 15 Cr. 171 (ALC)

Dear Judge Carter:

On behalf of my client, Abida Khan, and with the consent of the government, I am writing to request a one week enlargement of time, from January 27, 2016, until February 3, 2016, to produce financially responsible co-signors to sign Ms. Khan's bond.

On January 13, 2016, Your Honor appointed me from the CJA panel to represent Ms. Khan in this case. On that date, the Court ordered Ms. Khan released pending trial, on the following conditions: that Ms. Khan submit to electronic monitoring in her home district, the District of Nevada, subject to a curfew; that she sign a personal recognizance bond in the amount of \$500,000, to be co-signed by two financial responsible persons; that she restrict her travel to the Districts of Nevada and New Jersey and to the Southern and Eastern Districts of New York; that she surrender her travel documents and make no new applications for such documents; and that she submit to strict pretrial supervision. Your Honor allowed Ms. Khan until tomorrow, January 27, 2016, to satisfy the conditions of her bond.

Ms. Khan is compliant with all aspects of her release, but she has not yet secured two financially responsible persons to sign her bond. To allow Ms. Khan more time to do so, I am requesting an additional week. Ms. Griswold, one of the responsible prosecutors on this matter, has no objection to the Court's granting the additional time, upon my confirming Ms. Khan is currently subject to electronic monitoring, which I have done by speaking with Ms. Khan and her Pretrial Services officer in Nevada. I understand from Pretrial that Ms. Khan's electronic monitoring began on or about January 15, 2016, two days after her appearance in this district.

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If Your Honor is inclined to grant this request, I respectfully ask that Your Honor memo endorse this letter below.

Respectfully submitted,



Joanna C. Hendon

So Ordered: HON. ANDREW L. CARTER, JR.

cc: AUSA Daniel S. Goldman
AUSA Andrea M. Griswold